

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JEFFREY L. NEWELL :
Plaintiff :
v. : CASE NO. 1:02-cv-4161
JOHN DOE and LIBERTY MUTUAL :
GROUP INSURANCE :
Defendants :

CONSENT MOTION TO CONTINUE
SETTLEMENT CONFERENCE

____ The Defendant, Liberty Mutual Group, through counsel, Giancarlo M. Ghiardi, and DeCARO, DORAN, SICILIANO, GALLAGHER & DeBLASIS, LLP, respectfully moves this Court to continue the Settlement Conference scheduled in this case and as grounds states as follows:

1. This case is presently scheduled for a Settlement Conference before Magistrate Judge Bredar on **Wednesday, September 3, 2003** at **9:00 a.m.** in Baltimore, Maryland,

2. Undersigned counsel has recently been assigned the defense of this matter on behalf of Defendant Liberty Mutual Group and has recently filed a Notice of Substitution of Counsel in place of Roy W. Anderson, Esq.

3. Undersigned counsel is presently scheduled to participate in a jury trial, in the case of Wendell Samuel, et al v. Ethelbert Dawson, in the Circuit Court for Prince George's

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County, Maryland in Case No. 99-06107, and the trial in the Samuel case is to begin on September 3, 2003.

4. The law firm of DeCaro, Doran has recently had three attorneys take other positions, and it would be very difficult for undersigned counsel to obtain coverage for this Settlement Conference.

5. Undersigned counsel has contacted Plaintiff's counsel regarding his position on this Motion to Continue and has been authorized to indicate to the Court that Plaintiff's counsel consents to the foregoing Motion to Continue so long as the Settlement Conference takes place within thirty days from the presently scheduled date of September 3, 2003 on a date mutually acceptable to both counsel.

WHEREFORE, for the above reasons, it is respectfully requested that this Court continue the Settlement Conference in the above-captioned case and reschedule same as requested herein.

Respectfully submitted,

DECARO, DORAN, SICILIANO,
GALLAGHER, & DeBLASIS, LLP

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By: _____ /s/
Giancarlo M. Ghiardi
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 28th day of August 2003, a copy of the foregoing Motion for Continuance of Scheduling Conference was delivered by facsimile, electronically and by first class mail, postage prepaid, to:

John E. Kelly, Esq. [410-638-9468]
Law Offices of John E. Kelly, P. A.
516 Rock Spring Avenue
Bel Air, MD 21014

Attorney for Plaintiff

/s/
Giancarlo M. Ghiardi

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ORDER OF COURT

The foregoing Consent Motion to Continue having been read and considered, it is this _____ day of _____, 2003, by the United States District Court for the District of Maryland, hereby

ORDERED, that the Scheduling Conference set in for September 3, 2003 at 9:00 a.m. be and it hereby is continued to a date mutually available to both counsel for the Plaintiff and counsel for the Defendant which said date shall be on or before October 3, 2003.

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James Bredar
U. S. Magistrate Judge

COPIES TO:

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